

Factor	Bacteria, Human Sources	Bacteria, Nonhuman Sources
Risk to human health?	Yes	Yes
Is the risk quantifiable?	Yes. Epidemiologic studies permit quantification of the risk to humans of exposure to pathogens as a result of contamination of surface waters with human waste.	No. Available data indicate that there is a risk to human health but the studies necessary to quantify the risk have not yet been conducted
Is there an applicable criterion?	Yes	No (narrative is applicable, but without additional studies, there is no mechanism for translating the narrative criterion into a numeric value)
Is there a mechanism for assessing attainment of water quality standards?	Yes. Bacteria counts in excess of EPA's recommended criteria are considered to indicate unacceptable risk and impairment of primary contact recreational uses	No. Since there is neither a numeric criterion recommendation nor a method for translating a narrative criterion into a numeric value, there is no mechanism for assessing attainment or nonattainment of a primary contact recreation use due to contamination of the surface water due to nonhuman sources of bacteria/pathogens.
Can a water be listed on a States' 303(d) list?	Yes, if monitoring data show an exceedance of the applicable criteria.	No. There are no criteria at this time.
Can a State be required to conduct a TMDL to address an identified impairment?	Yes	No
Required mechanisms for controlling risk to humans	Identify and control uncontrolled sources of human wastes to surface waters to reduce bacteria counts to acceptable levels	None

Optional methods of controlling risk to humans	In the interim, before development and implementation of a TMDL to restore recreational uses, States may issue recreational advisories providing advice to citizens about the risks of recreation in an impaired water (i.e., don't swim after a rain event)	States may, at their discretion, use their criteria for protection of recreation from human sources of pathogens as screening values for identifying surface waters that may pose greater risk to swimmers. States may issue swimming advisories or otherwise notify swimmers of possible risk.
When may a recreational use be changed?	If it is determined that the use has been impaired since at least November 28, 1975 and restoration of the use is not possible for one or more of the reasons listed at 40 CFR 131.10(g), the recreation use may be changed or removed	At this time, since there are no criteria and no basis for determining whether or not a use is attained or existing, there is no basis for removing or modifying the recreation use of a surface water based solely on nonhuman sources of pathogens. If criteria recommendations are developed that would permit assessment of attainment, then the requirements of the Federal regulations at 131.10(g) would become applicable.